

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	)	Case No. 19-31572
John D Streeter	)	Chapter 13
Donna M Streeter	)	Judge: A. Benjamin Goldgar
Debtors	)	

**NOTICE OF MOTION AND CERTIFICATE OF SERVICE**

John D Streeter  
Donna M Streeter  
269 S. Wildspring Road  
Round Lake, IL 60073

DAVID M SIEGEL  
790 CHADDICK DR  
WHEELING, IL 60090

Please take notice that on February 21, 2020 at 11:00 am, a representative of this office shall appear before the Honorable Judge A. Benjamin Goldgar, at the Park City Branch Court, 301 Greenleaf Ave, Rm B, Park City, IL 60085 and present the motion set forth below. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

I certify that this office caused a copy of this notice to be delivered to the above listed debtors by depositing it in the U.S. Mail at 801 Warrenville Road, Lisle, IL and to the debtor's attorney electronically via the Court's CM/ECF system on February 07, 2020.

/s/ Glenn Stearns

FOR: Glenn Stearns, Chapter 13 Trustee

---

**MOTION TO DISMISS FOR UNREASONABLE DELAY AND FAILURE TO MAKE PLAN PAYMENTS**

Now comes Glenn Stearns, Chapter 13 Trustee, and requests dismissal of the above case pursuant to 11 U.S.C. Section 1307 (c) and in support thereof, states the following:

1. The Debtors filed a petition under Chapter 13 on Wednesday, November 6, 2019.
2. The Debtors have failed to:
  - a. File amended schedule(s) I and J.
  - b. File an amended plan.
  - c. Make all required plan payments (two month default).
3. As a result, the Debtors have failed to comply with the Bankruptcy Code and have caused an unreasonable delay that is prejudicial to creditors.

WHEREFORE, the Trustee prays this case be dismissed for cause pursuant to Section 1307 (c).

Respectfully Submitted;

/s/ Glenn Stearns

Glenn Stearns, Chapter 13 Trustee  
801 Warrenville Road, Suite 650  
Lisle, IL 60532-4350

---

FOR: Glenn Stearns, Chapter 13 Trustee